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*Attorneys for Defendants Royal Bank of Canada
and RBC Dominion Securities Corporation
n/k/a RBC Capital Markets, LLC*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

HEALEY ALTERNATIVE INVESTMENT
PARTNERSHIP,

Plaintiff,

vs.

ROYAL BANK OF CANADA and RBC
DOMINION SECURITIES CORPORATION
n/k/a RBC CAPITAL MARKETS, LLC,

Defendants.

No. 10-01567 (RMB) (KMW)

DECLARATION OF SHANE P.
GADBAW IN SUPPORT OF MOTION
FOR SUMMARY JUDGMENT OF
DEFENDANT RBC CAPITAL
MARKETS, LLC

I, Shane P. Gadbow, hereby declare as follows:

1. I am the Co-Founder and Managing Chief Executive Officer of XE Capital Management, LLC, a hedge fund and private equity manager, with a focus on illiquid, innovative, new investment products. I am also an independent consultant, providing expert advice regarding the hedge-fund linked derivative market.

2. I make this declaration based on personal knowledge except where otherwise noted herein, and would and could testify to the following if called upon to do so.

3. Attached as Exhibit 1 is a true and correct copy of my Expert Report dated October 11, 2013, prepared for this litigation. A complete recitation of my professional qualifications is included in my Expert Report, and a copy of my *curriculum vitae* is annexed

thereto as Exhibit 1.

I declare under penalty of perjury that the foregoing is true and correct.

Executed at Beaver, Utah on this 24 day of May, 2013.

A handwritten signature in black ink, consisting of stylized initials 'SPG' followed by a long horizontal flourish.

Shane P. Gadbaw